

Continuum of Care Responsibilities

Introduction

The award of federal grants comes with many administrative responsibilities. The Department of Planning and Building administers several federal grants such as the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME grant, and the Continuum of Care (CoC) grant. In the last two years, the U.S. Department of Housing and Urban Development (HUD) released new regulations for the ESG, HOME, and CoC programs, all of which require more administration than in previous years. The CoC grant however, is the program that calls for a CoC governing body such as Homeless Services Oversight Council (HSOC) and CoC planning activities.

Continuum of Care Responsibilities/Bureaucracy (per the CoC regulations)

The U.S. Department of Housing and Urban Development (HUD) expects CoCs to spend a significant amount of time administering its grants. Some of the administrative responsibilities of the CoC per 24 Part 578 of the regulations include:

- **Establishing an operating a Continuum of Care body.** In San Luis Obispo County, this body is the Homeless Services Oversight Council (HSOC). Required tasks include:
 1. advertising and appointing representatives from relevant organizations as defined by HUD (i.e. non-profit homeless assistance providers, governments, social service providers, affordable housing developers, law enforcement, organizations that serve veterans, homeless/formerly homeless individuals, and others),
 2. holding meetings of full membership with published agendas at least semi-annually,
 3. adopting and following a written process to select a board on behalf of the CoC body,
 4. appointing additional committees, subcommittees, or workgroups,
 5. updating a governance charter annually,
 6. consulting with the County and its subrecipients in establishing performance targets and evaluate outcomes,
 7. evaluating outcomes of projects funded under the Emergency Solutions Grant program,
 8. establishing and operating a centralized or coordinated assessment system for housing and services, and
 9. establishing and consistently following written standards for providing CoC assistance.
- **Designating and operating a Homeless Management Information System (HMIS).** This includes designating a single HMIS for the CoC, managing the HMIS program, review and revising a privacy plan, security plan, and data plan.
- **Continuum of Care planning.** This includes:
 1. developing a plan that coordinates and implements a housing and services system within the region that meets the needs of the homeless individuals and families (i.e. outreach/engagement, shelter, housing, supportive services, and prevention),
 2. conducting an annual sheltered point in time count and at least a biennial unsheltered point in time count,
 3. conducting an annual gaps and needs analysis,
 4. providing all other information needed for the Consolidated Plan, and
 5. consulting with the County for allocation the ESG funds.
- **Monitoring.** All CoC subrecipients must be monitored for program compliance annually, and HUD will monitor the County regularly as well.
- **Environmental review.** Complete environmental review for each program as required by 24 CFR part 50.

ATTACHMENT B

- **Writing annual grant application.** Read the Notice of Funding Availability, coordinate with the non-profit subrecipient agencies, write and submit the annual competitive application.
- **Administering the grant agreements and writing Annual Progress Reports (APR).** After the grants are awarded by HUD, process the HUD grant agreements. Also, complete an APR at the end of every program year (which currently consists of seven APRS).
- **Subrecipient agreements.** Write and administer agreements with subrecipients.
- **Fiscal controls.** Process, disburse, and track expenditures. Ensure funds are being drawn down in a timely manner.
- **Recordkeeping.** Ensure compliance with all recordkeeping requirements